

REMARKS

Favorable reconsideration of this application in light of the following discussion is respectfully requested.

Claims 6 and 10-16 are presently pending in the present application. Claim 1 has been amended and claims 11-16 have been added by way of the present Amendment. Claims 1-5 and 7-9 have been canceled without prejudice or disclaimer. No new matter is introduced by this amendment.

In the Office Action, claim 9 was rejected under 35 U.S.C. §112, second paragraph, claims 6, 8, and 10 were rejected under 35 U.S.C. §102(b) as being anticipated by *Jermo* (U.S. Patent No. 5,543,015), claims 6-8 and 10 were rejected under 35 U.S.C. §102(b) as being anticipated by *Ishii* (U.S. Patent No. 6,296,738), claims 6, 7, and 10 were rejected under 35 U.S.C. §102(b) as being anticipated by *Matuszczyk et al.* (U.S. Patent No. 6,416,630), and claims 6-10 were rejected under 35 U.S.C. §102(e) as being anticipated by *Romanski* (U.S. Patent No. 7,374,640).

Regarding the rejection under 35 U.S.C. §112, second paragraph, claim 9 has been canceled without prejudice or disclaimer thereby rendering this rejection moot. Accordingly, the Applicant requests the withdrawal of the indefiniteness rejection of claim 9. The Applicant further notes that the word entirely is not present in new independent claim 11, which recites a linear part.

Regarding the various anticipation rejections under 35 U.S.C. §102, the Applicant respectfully requests the withdrawal of the rejections for the reasons set forth below.

MPEP §2131 notes that “[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” Furthermore, MPEP §2131 notes that in order to establish anticipation “[t]he

identical invention must be shown in as complete detail as is contained in the ... claim.” As will be demonstrated below, the cited references clearly do not meet each and every limitation of the independent claims, or the claims that depend therefrom.

Independent claim 6 recites “[a] press belt ... comprising ... many drain grooves ... and many lands positioned between the adjacent grooves ..., wherein said land has an upper surface which is entirely curved upwardly as a transverse sectional configuration along a belt width direction, wherein said lands are spaced apart from each other by the groove therebetween, and wherein said transverse sectional configuration of the land is an upward parabolic configuration.”

Jermo describes a groove configuration for a press belt where the groove configuration consists of a curved bottom and two outwardly diverging side walls. In a first embodiment the bottom wall is semi-circular, and in a second embodiment the bottom of the groove is substantially flat and the bottom corners are radiused to provide a smooth transition between the flat bottom wall and the divergent side walls. In between the grooves are lands (16, 32) that are depicted as having a constant elevation or thickness, and are in fact depicted as being non-curved or flat.

Thus, *Jermo* does not disclose a press belt with land that has an upper surface which is entirely curved upwardly as a transverse sectional configuration along a belt width direction, and wherein the transverse sectional configuration of the land is an upward parabolic configuration, as recited in claim 6. Therefore, *Jermo* does not anticipate claim 6. Accordingly, the Applicant respectfully requests the withdrawal of the anticipation rejection of claim 6 based on *Jermo*.

Ishii describes a shoe press belt formed with grooves for draining water, where the grooves define a plurality of laterally spaced channels, the channels having outwardly curved side walls and may include a curved bottom. In between the grooves are lands, such as tops (22),

that are depicted as having a constant elevation or thickness, and are in fact depicted as being non-curved or flat. Note that radiused top corners (24) are curved, but that tops (22), which are depicted as being substantially wider than corners (24), have a constant elevation.

Thus, *Ishii* does not disclose a press belt with land that has an upper surface which is entirely curved upwardly as a transverse sectional configuration along a belt width direction, and wherein the transverse sectional configuration of the land is an upward parabolic configuration, as recited in claim 6. Therefore, *Ishii* does not anticipate claim 6. Accordingly, the Applicant respectfully requests the withdrawal of the anticipation rejection of claim 6 based on *Ishii*.

Matuszczyk et al. describes a press jacket of a press device that includes an outer circumferential surface that is provided with grooves and/or blind bores. The grooves and/or bores include a side wall having an opening region with a bevel and/or rounded section that extends along a curved line. shoe press belt formed with grooves for draining water, where the grooves define a plurality of laterally spaced channels, the channels having outwardly curved side walls and may include a curved bottom. In between the grooves are outer circumferential surfaces (12) that are depicted as having a constant elevation or thickness, and are in fact depicted as being non-curved or flat.

Thus, *Matuszczyk et al.* does not disclose a press belt with land that has an upper surface which is entirely curved upwardly as a transverse sectional configuration along a belt width direction, and wherein the transverse sectional configuration of the land is an upward parabolic configuration, as recited in claim 6. Therefore, *Matuszczyk et al.* does not anticipate claim 6. Accordingly, the Applicant respectfully requests the withdrawal of the anticipation rejection of claim 6 based on *Matuszczyk et al.*

Romanski describes a grooved belt that can be formed, for example, by nestling small liquid elastomer ribbons next to each other to form the lands (20) and shaped grooves (22) shown in FIG. 2. FIG. 3B also shows exemplary profiles of ribbons.

However, *Romanski* does not disclose a press belt wherein the lands are spaced apart from each other by the groove therebetween, and wherein the transverse sectional configuration of the land is an upward parabolic configuration, as recited in claim 6. None of the embodiments shown therein has this particular advantageous combination of features. Therefore, *Romanski* does not anticipate claim 6. Accordingly, the Applicant respectfully requests the withdrawal of the anticipation rejection of claim 6 based on *Romanski*.

Claim 10 is considered allowable for the reasons advanced for independent claim 6 from which it depends. This claim is further considered allowable as it recites other features of the invention that are neither disclosed nor suggested by the applied references when those features are considered within the context of independent claim 6.

New independent claim 11 recites features of previous claim 9, which was only rejected as being anticipated by *Romanski*. Claim 11 recites “[a] press belt ... comprising ... many drain grooves ...; and many lands positioned between the adjacent grooves ... wherein said land has an upper surface which is curved upwardly as a transverse sectional configuration along a belt width direction, wherein said lands are spaced apart from each other by the groove therebetween, wherein said upper surface of the land comprises a linear part on its top as a transverse sectional configuration along the belt width direction, and wherein a width of said linear part is defined as “s” and a width of the land is “W”, and a relation between them is such that $s/W < 0.5$.”

The Office Action suggests with respect to previous claim 9 that *Romanski* teaches a linear part on the upper surface of the land in FIGS. 2 and 3B if “s” is zero or nearly zero. However, such an interpretation is contrary to the language of claim 11, since claim 11

specifically recites a linear part, and no such linear part would exist when “s” is zero. Accordingly, the embodiments depicted in FIG. 2 and the lower portion of FIG. 3B not only do not include such a linear part on the land, but they also do not include land portions that are spaced apart from each other. Furthermore, the embodiment in the upper portion of FIG. 3B does not include land that has an upper surface which is curved upwardly. Therefore, *Romanski* does not anticipate claim 11. Additionally, newly added claims 12-16 are allowable for the same reasons as submitted above for claim 11 from which they depend.

Therefore, the present application is believed to be in condition for allowance. Favorable consideration is respectfully requested. If any unresolved issues remain, it is respectfully requested that the Examiner telephone the undersigned attorney at (703) 519-9957 so that such issues may be resolved as expeditiously as possible.

To the extent necessary, a petition for an extension of time under 37 CFR §1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 504213 and please credit any excess fees to such deposit account.

Respectfully Submitted,

DITTHAVONG MORI & STEINER, P.C.

September 3, 2008
Date

/Christopher D. Ward/
Christopher D. Ward
Attorney/Agent for Applicant(s)
Reg. No. 41,367

Phouphanomketh Ditthavong
Attorney/Agent for Applicant(s)
Reg. No. 44,658

918 Prince Street
Alexandria, VA 22314
Tel. (703) 519-9957
Fax. (703) 519-9958